

# USDA Child Nutrition Programs Administrative Review Summary Report

---

**School Food Authority:** Mukwonago School District

**Agency Code:** 67-3822

**School(s) Reviewed:** Mukwonago High School and Rolling Hills Elementary School

**Review Date(s):** Monday, February 20 – Thursday, February 23, 2017

**Date of Exit Conference:** February 23, 2017

---

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage [dpi.wi.gov/school-nutrition/national-school-lunch-program/financial](http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial), scroll down to the unpaid meal charges section.

## **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Mukwonago School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance and interested in gaining

knowledge while asking for suggestions. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The district participates in many opportunities to solicit feedback from the students, encourage participation in the school meal programs, work with the Milk Marketing Board, and search for better food or beverage products for the meal programs. They received a PEP grant for some activities. The director participates in a multi-district purchasing cooperative to maximize purchasing power and exposure to more products for student meals and A la Carte offerings. The director attends conferences and food shows looking for products for in-house testing with students and cooks/bakers.

The school nutrition director places a heavy emphasis on employee training and promoting from within, always developing staff for future positions. All employees are expected to complete food safety training and other district-provided continuing education. She provides opportunities for staff to attend school nutrition association meetings and conferences.

Visiting Rolling Hills Elementary School to observe lunch showed that employees are well-trained and empowered to provide great customer service while meeting the meal program standards. The students and staff are considerate and appreciative of the food options offered at lunch service. Although the kitchen is small, the staff works well together and efficiently under great leadership. Food safety and special dietary needs are high priorities.

While reviewing the High School, we were impressed at the amount of work which is accomplished in such a small area to serve many items to a large student population. The kitchen staff work in balance under great leadership of the manager and director to operate efficiently. The cashiers effectively determine a reimbursable meal from the A la Carte items. There is a lot of activity and it is handled well.

The signage and decorations at buildings were fine and placed well. Thank you for problem-solving where the food safety inspection reports will be placed. The little magnetic signs are very professional looking. The Mukwonago school nutrition team has completed many projects through the services of dietetic intern students during their learning time frame. That is a great relationship!

## **REVIEW AREAS**

### **1. MEAL ACCESS AND REIMBURSEMENT**

#### **Commendations**

- There were no errors in the meal benefit issuance area; great work!
- Applications are reviewed in a timely manner. An eligibility determination was made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application (usually the same day). The date determination took place and the signature of the Determining Official are entered on the application. All of the information is entered into Infinite Campus software from where reports are pulled.
- All free/reduced applications and the direct certification runs were available for review. All applications have been approved precisely and students are receiving the correct benefits.
- Applications with only one frequency of payment indicated for all of their reported incomes are processed appropriately using the Income Eligibility Guidelines

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/income-eligibility-guidelines-1617.doc>).

- Thank you for contacting the households for incomplete applications or questions on the information provided, including missing social security digits, household size box, signatures and special situation incomes. If the household provided only annual income, the LEA must follow up with the household to ensure that the amount is an accurate reflection of the household's current income.
- It is wonderful that you have the current nondiscrimination statement included on all correspondence with the household in the meal benefit application process. Please continue to work on the font size for all templates.
- Great job running the Direct Certification matches in the required time frames, when you receive a new student and other times to pick up any newly eligible students.
- The Confirming Official and Verifying Official sign and date the application during the verification process. The whole process is handled well.
- The individual school counts and the consolidated monthly claim were completed correctly. Thank you for using the Edit Check as part of the claiming process, which included checking the enrollment eligibility maximum against the actual and circling the count when it met the maximum.

### **Comments/Technical Assistance/Compliance Reminders**

#### **Certification and Benefit Issuance**

- Two hundred seventy-six eligibility determinations were reviewed and no errors were identified. Great job with the Determining Official duties!

#### **Applications and Notification Letters**

- When a household has income in addition to a loss from a business, that income must be included on the free and reduced application in full and is not offset by the business loss.
- You may need to work with the software company about the income eligibility guidelines level Infinite Campus flags for error-prone when there is one frequency of income versus several frequencies.
- Please consult the DPI template letters against the letters generated from your software to be sure all parts are complete, including the current nondiscrimination statement.
- DPI has recently posted a notification letter template that SFAs may send to families called "Notice to Households - Joint Custody": <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/joint-custody-template-letter-1617.doc>.
- Income Eligibility Guidelines (IEG) should not be posted to the school website or given to households.

#### **Zero Income**

- Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

#### **Household Size Box**

- As a reminder, for the household income size box:

- If the Total Household Members box has been completed, but the number of children and adults listed on the application add up to a different number, the SFA is required to follow up with the household to clarify the correct number of people in the household and ensure all household member have been included on the application before an eligibility determination is made.
- If the Total Household Members box has not been completed, the SFA is required to follow up with the household to confirm the total number of household members. It cannot be assumed that the number of people listed on the application is the total number of household members. This box has been added as an edit check to ensure all members of the household are included and can make a difference in the eligibility determination. Per clarification from the USDA Regional office, any application that does not have this box completed is considered an incomplete application.

### Limited English Proficiency (LEP)

- Application materials and other communications with households concerning eligibility determinations must be provided in a language that parents or guardians can understand in order to diminish any language barriers to participation for individuals with limited English proficiency.
- LEAs must make reasonable efforts to provide household letters and application forms to families in the appropriate languages.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, Hmong and Albanian.
- The FNS website offers the application materials in 49 languages  
<http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>.
- The nonprofit food service account may be used to pay for translation services for food service purposes if there is a need to translate materials in a language that is not currently available.

### Other Source Categorical

- If a household submits an application that indicates Other Source Categorical Eligibility, such as homeless, migrant, or runaway, the SFA must confirm the children's status by an appropriate program official either through direct contact with the agency or by a list of names provided by the agency, before meal benefits can be provided. Once confirmed, this eligibility is only available to the designated child and is not extended to other members of the household.
- Applications that indicate a child is a foster child are categorically eligible for free meals. The child's status for free meals does not require confirmation of eligibility prior to receiving benefits. This benefit is not extended to other household members.

### Transferring Students

- When a child transfers to a new school within the same LEA, the new school must accept the eligibility determination from the child's former school, if the child has an individual eligibility determination.
- Transferring the eligibility determination between LEAs ensures that qualifying students continue to receive school meal benefits as they transition to new schools, and avoids the possibility of unpaid meal charges. FNS strongly encourages LEAs to immediately accept the eligibility determinations made at a student's previous LEA when a student transfers between LEAs during the school year, over the summer, or at the start of the next school year. The transfer of eligibility between LEAs for students attending CEP schools will be required by July 1, 2019.

### Effective Date of Eligibility

- LEAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the official approves the application. This flexibility applies only to complete applications containing all required information and for all applications. See SP 11-2014 for more information. The SNT must be contacted prior to implementing this flexibility for approval. Please contact the Assistant Director of the School Nutrition Team for more information and approval.

### Direct Certification

- The effective eligibility date for a DC eligible student is the date of the original output file.
- Only one student was found to not been updated after the incorrect DC run between July 1 and Aug 10, 2016. The error was made at the State level, but corrected during Mukwonago's review preparation before the onsite review.

### Disclosure

- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>. This would be your school secretaries.

### **Verification**

- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.

### **Meal Counting and Claiming**

- Meals must be offered to all students each day school is in session a full day, so DPI has posted a Field Trip resource page on our website to help schools offer a meal to students found under NSLP, then meal planning. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/field-trip-meals-templates.doc>. Thank you for offering meals on field trips days.
- Please note that SFAs may claim visiting students in the paid category or the individual's category with documentation, unless they are from a CEP school.
- REMINDER: Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and will be charged for the milk as an a la carte item.

### **Findings and Corrective Action Needed:**

#### **Benefit Issuance**

- ❑ **Finding #1:** Currently, if parents wish to decline the automatic waiver or reduction of school registration fees, they return a signed form. DPI requests instead that your SFA asks for written consent from the parent or guardian to use the information provided on the application or through direct certification for a reduction or waiver in registration fees. It may be best to include the explanation form in the meal application packet so all households are aware of this additional benefit to complete the paperwork for free or reduced meal application.

**Corrective Action Needed:** Please submit a statement of how the SFA will proceed with Sharing Information with households that are eligible for meal benefits.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you very much to the food service director and all the food service staff members for working so hard to plan and prepare a variety of healthy meals every day. The food service director sent in extremely organized, thorough documentation prior to the review, which was incredibly helpful. Keep up the great work!

### Findings and Corrective Action Needed

☐ **Finding #2:** There was a weekly grain shortage for the week of review (January 9-13, 2017) on the K-5 lunch menu. If a student takes the entrée option that offers the lesser amount of grain each day, they still need to be offered their weekly grain requirement which is 8 ounce equivalents (oz eq) grain.

**Corrective Action Needed:** Please submit a written statement explaining what you will add to the menu to ensure that the grain minimum is met for this menu week.

- **CA was completed on-site. The food service director increased the serving of rice to ½ cup and increased the serving of French toast sticks to 4. No further action needed. Thank you!**

☐ **Finding #3:** On the 9-12 lunch menu there was a daily grain shortage for the week of review on the main entrée line (French toast stick and omelet entrée option) and on the deli line (this was a recurring issue), there was no starchy vegetable offered for the week of review on the deli line and pizza line. Grades 9-12 must be offered 2 oz eq grain per day and ½ cup of starchy vegetable over the course of the week. On the deli line, students may take a sandwich and either a 1 oz eq WGR chip or a bag of baked potato chips (which are not creditable). There was a recurring daily grain shortage on this line because a few of the entrée items (hamburger, cheeseburger, and Uncrustable) credit as less than 2 oz eq grain, and if the students choose to take the potato chip option they are not being offered their daily requirement. Before meal observation, we discussed the different combinations that students would need to take for the grain to count as a component. The missing starchy vegetable was due to the fact that the purchased potato salad served does not have any crediting documentation available; therefore, it cannot be credited towards any component.

**Corrective Action Needed:** Please submit a written statement explaining what you will add to the menu to fix the grain shortages and the missing starchy vegetable. Please submit a standardized recipe for the potato salad.

- **CA was partially completed on-site. The food service director added a mini cinnamon roll to the French toast sticks and omelet option. To fix the recurring problem with the sandwich + potato chips option, a new bun and a larger Uncrustable will be served that are each 2 oz eq grain. This way students will take their daily grain requirement even if**

**they do not select the WGR chips. The potato salad recipe needs to be tweaked to provide the correct amount of potato per serving; please submit that as CA.**

☐ **Finding #4:** The 1 oz bag of Fritos served with the walking taco menu item are not whole grain-rich (their first ingredient is “corn.”) A whole grain-rich (WGR) product has a first ingredient containing the word “whole.” Look for “whole corn” as the first ingredient in a new corn chip product.

**Corrective Action Needed:** Please submit the nutrition facts label of a new whole grain-rich product that will be used instead.

- **CA was completed on-site. The reduced-fat WGR bulk Fritos will be used.**

☐ **Finding #5:** Before the on-site review, breakfast production records were not being kept. A small amount of reimbursable breakfasts are served daily, with most students purchasing items a la carte. When reviewing documentation before the review, this issue was discussed and a tally sheet was immediately implemented to keep track of the items served as part of a reimbursable breakfast. During the review, invoices and results from the POS system were reviewed to confirm that reimbursable breakfasts were served during the week and month of review. We discussed possible methods for keeping production records given the large volume of a la carte items sold, and also talked about the production record requirements that are posted on our website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>.

**Corrective Action Needed:** Please submit one week of completed breakfast production records.

☐ **Finding #6:** There was some confusion over the Offer versus Serve (OVS) requirements at breakfast, and the breakfast signage did not accurately communicate all of the reimbursable breakfast options. The signage should clearly state that students must take ½ cup fruit or vegetable, but that they may take the full 1 cup if they wish. Additionally, since cookies are not allowable at breakfast (per Exhibit A) please change the “UBR cookie” to an “UBR round” on the menu. There is an OVS webcast on our website that may be helpful in training staff: <https://dpi.wi.gov/school-nutrition/training/webcasts#ovs>. <https://dpi.wi.gov/school-nutrition/training/webcasts#sbp>

**Corrective Action Needed:** Please submit a new version of the breakfast signage that will be posted to ensure students know what constitutes a reimbursable meal. Please also submit a written statement explaining your plan for training staff on breakfast OVS guidelines.

☐ **Finding #7:** Graham crackers are offered daily at lunch, and they count as a grain-based dessert per Exhibit A ([https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa\\_fbg.pdf](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf)). Therefore, they are subject to the weekly 2 oz eq limit on grain-based dessert. Technical assistance was given on menu planning, as there are other grain-based desserts offered throughout each week of the menu cycle.

**Corrective Action Needed:** Please submit a written statement indicating what you will do to ensure that the menu does not exceed the weekly 2 oz eq grain limit.



□ **Finding #8:** The lunch signage posted at the elementary school does not include the OVS requirement to take ½ cup of fruit and/or vegetable. Technical assistance was given on either finding new signage or simply adding a smaller sign that communicates this requirement.

**Corrective Action Needed:** Please submit a photo or a copy of the signage you will use at the elementary school that tells students they must take ½ cup of fruit and/or vegetable.

## **GENERAL PROGRAM COMPLIANCE**

### **SMART SNACKS**

#### **Comments/Technical Assistance/Compliance Reminders**

- The food service director and other staff at Mukwonago Area School District are doing a fantastic job of complying with the Smart Snacks rule. 10% of the foods and beverages sold were reviewed, and all were found to be compliant. Great work!
- Remember to keep track of exempt fundraisers that sell non-compliant foods or beverages to students during the school day, since each student organization may have two exempt fundraisers per school year. Each exempt fundraiser may be up to two consecutive weeks in length.
- When any staff or students need information on the Smart Snacks rule, you may direct them to the resources on our website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

## **3. RESOURCE MANAGEMENT**

### **Commendations**

- The school nutrition director and district business manager are working to define the Meal Charge policy due July 1, 2017 and to be communicated to households for implementation next school year.
- Great job running the Paid Lunch Equity tool! The current weighted average for 2016-17 SY tool is \$2.67; the USDA targeted price is \$2.78. Since you are under the target price, your SFA will be required to increase prices, however, you may apply for an exemption, if interested.

### **Comments/Technical Assistance/Compliance Reminders**

#### **Nonprofit School Food Service Account**

- The SFA's Child Nutrition program report provides a compilation of meals claimed, the reported revenues and expenditures, amount of federal reimbursement received and per meal costs for lunch, breakfast or other programs. The Aids Register tracks all program deposits made to the SFA's account and the amount deducted from the reimbursement to pay for shipping, handling and processing costs of USDA Foods. These may be found on our Online Services webpage: <http://dpi.wi.gov/nutrition/online-services>.
- SFAs must limit the net cash resources in order to not exceed three months average expenditures. The school food service fund may not have an ending fund balance in excess of 3 month operating expenses, as this is considered "Excess Cash Balance". Mukwonago School District SFA will be receiving a letter alerting that there is an excess balance in the school nutrition fund. There is a



plan to repair/replace equipment in the Central Kitchen during the coming year, which will use those monies.

### Annual Financial Report:

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The ending balance on June 30 from the previous year needs to be the beginning balance on July 1 for the current year.
- The ending Fund 50 balance or the A la Carte columns of the Annual Financial Report on June 30 can never be a negative balance. A transfer must be made from the non-federal funds to bring the ending balance to \$0.00.
- When tracking revenues and expenditures, please keep in mind:
  - Expenses for paper supplies, chemicals, thermometers, etc., should be reported under “Other”. Only expenses for edible food items and beverages should be reported under “Food”.
  - “Equipment” should reflect major purchases of equipment. Utensils, pans, smaller equipment such as a cart, etc., should be reported under “Other”.
  - Under “Purchases Services” you should be reporting any time you pay someone for services provides such as equipment repair and health inspections.
  - Under “A la Carte”, you should be reporting the expenses for any food items served to students that are not claimed as part of the reimbursable meal. Revenues and expenses from adult meals would also be included here.
  - When revenues are recorded from the federal reimbursement payments, you want to make sure that you are recording the full reimbursement based on the printed claim form and not what is actually deposited into your account. As you will note on the claim, there may be money deducted from shipping, handling and processing fees for USDA Foods. The amount deducted from your revenue should be reported as a food expenditure.

### Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel. The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>.
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to have a written and clearly communicated policy that addresses unpaid meal charges, by July 1, 2017. For a snap-shot on what the policy must include, see the Unpaid Meal Charges “In a Nutshell” at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>. For a more comprehensive overview, see SP 58-2016: Unpaid Meal

Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>, including:

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

### **Paid Lunch Equity**

- The Paid Lunch Equity tool must be completed yearly and prices raised accordingly with a maximum yearly increase of \$0.10 as required by regulation, unless you care to apply for a yearly exemption.

### **Revenue from Non-program Foods**

- **Non-program Foods Revenue Rule SP-20-2016**  
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
  - Non-program Foods “In a Nutshell” <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.
  - Non-program foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies) and Catered Meals.
  - All non-program food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Non-program foods may not be supported by reimbursable meals or have a non-program foods loss absorbed by the food service account. Thus non-program foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
  - Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals  
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursements are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) may be used to determine 2017-18 SY prices since rates aren’t released until July 1 of each year.

To document non-program food compliance with the Federal regulation, the USDA Non-program Foods Revenue Tool needs to be completed. To do this, the SFA must select a reference period of at least 5 consecutive operating days of a regular school week, and compare the reference period revenue ratio to the food cost ratio to determine if the revenue ratio is equal to or greater than the food cost ratio. SFAs must separate their non-program food costs from their program food costs for the selected period to complete the Non-program Foods Revenue Tool. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance.

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

## **SFAs must collect the following SFA-wide information for the reference period**

### **Indirect Costs**

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. This could include items such as utilities, rent, printing and mailing services, administrative oversight, etc.
- Thank you for your past calculations for electricity and installing a meter to cost electricity to Fund 50; keep in mind that gas and water costs may not be assessed to Fund 50 without a utility study or separate meter for the kitchen.
- Allowable Expenditures assessed to the food service fund must be supported with documentation for things such as gas, electricity, waste removal, fuel, water, etc. for both public and private schools. Examples of supporting documentation for costs assessed to food service fund could include:
  - Rent – consultation with knowledgeable resource person on appropriate charges per facility (i.e., local realty broker who has knowledge of current rates for rent of similar facilities).
  - Utility charges - separately metered or current usage study by the local utility company.
  - Labor expenditures - based on actual amount of time worked specifically for the purpose of school food service times the employee's wages and benefits.
  - Printing/publishing – documentation of actual costs or documentation to support how these costs were prorated from the district's total costs, based on volume.
  - Waste disposal services, extermination services, and laundry services - documentation of actual costs or documentation to support how these costs were prorated from district's total.

### **Findings and Corrective Action Needed:**

#### **Comprehensive Review- Revenue from Non-program Foods**

- ❑ **Finding #9:** The USDA Non-program Revenue Tool must be completed yearly, at a minimum. The DPI Non-program Food Revenue Tool/Calculator located on our website feeds into the USDA tool and aids in calculating prices of non-program foods and meeting the USDA non-program food regulation <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>.

**Corrective Action Needed:** Please complete and submit the Nonprogram foods calculator or USDA tool to analyze compliance with the expense/revenue ratio.

## **4. GENERAL PROGRAM COMPLIANCE**

### **Commendations**

- The district Wellness committee meets very regularly and are currently working on the required updates to the policy to include goals, referencing Smarter Lunchroom techniques and the Healthy, Hunger-Free Kids Act, marketing policy, and how to inform the public of the Local Wellness Policy and the assessment. This revision should be completed by June 20, 2017.

- We appreciated that the lunch room area had the food safety inspection and the new “And Justice for All” posters posted on the cafeteria wall so the public can read the information.
- Civil rights training had been attended by all staff in the schools and documentation was available for review.
- Special dietary needs are handled well with color-coordinated instructions and tools. The staff takes it very seriously and is thorough in delivering a safe meal to the student.
- Water is available at no charge to students during the lunch and breakfast meal services in the service area.
- Food safety is well organized and trained. The kitchen staff use thermometers, handwashing, gloves, hairnets and aprons to perform their food service duties. Even the van drivers have good food safety practices. Logs are kept for cooler and freezer daily temperatures, dish machine temperatures, sanitizing solution and internal food temperatures. Nice work!
- The Food Safety Plan was available for review. It was obvious in observing the kitchen staff at work that they are very knowledgeable about foodservice practices and food handling practices. All temperature logs, calibration logs and sanitizing solution logs were up to date.
- The Food Safety Plans include a list of equipment, food processes 1-2-3, Standard Operating Procedures (SOP) and temperature logs. Please add an SOP for Field Trips.
- They are working with the public health sanitarian to approve a “Time As a Public Health Control” SOP.
- The department is using a new way to track Professional Standards training hours with individual employees keeping track of their training and certificates in a folder.
- Thank you for completing the required USDA and DPI reports and maintaining the paperwork in an organized manner.
- Thank you for reaching out with Breakfast promotions through the district newsletter, the information sheet about High School meals sent at the beginning of the school year, menus and periodic announcements about breakfast. A breakfast brochure is mailed to all high school students approved for free or reduced price meal benefits to encourage participation in breakfast, as well.

### **Comments/Technical Assistance/Compliance Reminders:**

#### **Civil Rights**

##### Nondiscrimination Statement

- When including the nondiscrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>. However, when space is very limited, such as on printed menus, only this abbreviated statement may be used, “**This institution is an equal opportunity provider,**” so that it can be printed in the same size font as the other printing in the document.

##### Public Release

- The annual Public Release should be sent to a local media source and grass root organizations, plus any major local employers anticipating employment layoffs. The district should decide if they care to post the Public Release on the school website, as it does contain both free and reduced income levels. This document should not be sent to the household.

### Special Dietary Needs

- SFAs must accommodate dietary requests that are supported by a signed medical statement from a licensed medical practitioner. Meals served to a students with special dietary needs who have a signed medical statement from a licensed medical practitioner do not need to meet meal pattern requirements. Additional information on special dietary needs can be found on the DPI School Nutrition Team website: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs>, including the prototype Medical Statement for Special Dietary Needs template, available in English, Spanish and Hmong.
- School food service staff may make food substitutions, at their discretion, for children for whom they do not have a signed medical statement from a licensed medical practitioner. It is highly recommended that the SFA have a completed medical statement on file from a medical authority (which could be the school nurse) to support the request. Accommodations made for students without a signed medical statement from a licensed medical practitioner must meet the USDA meal pattern requirements in order for the meals to be reimbursable. It is recommended that the SFA develop a policy for handling these types of accommodations to ensure that requests are equitable for everyone.

### Processes for complaints

- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days.

### **On-site Monitoring**

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program (SBP) beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016

<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.

### **Local Wellness Policy Summary for Administrative Review**

- The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 with full compliance of the requirements of the final rule by June 30, 2017.
- At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

### Content of the Wellness Policy

- At a minimum the wellness policy must include:
  - Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
  - Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
  - Standards for all foods and beverages provided, but not sold, to students during the school day.
  - Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
  - Description of public involvement, public updates, policy leadership, and evaluation plan.
- SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and the process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment results available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.
- A summary of the requirements can be found at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/LWP%20Summary%20-%20Final%20Rule.pdf>. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

### **Professional Standards**

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked.
- Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.



## Food Safety, Storage and Buy American

### Food Safety Plans

- The USDA FNS Office of Food Safety is excited to share a new educational resource for school nutrition professionals. *A Flash of Food Safety* [www.fns.usda.gov/ofs/food-safety-flashes](http://www.fns.usda.gov/ofs/food-safety-flashes) is an educational video series designed to help busy school nutrition professionals understand and practically apply safe food practices. The videos, available in English and Spanish, address five food safety topics: *Handwashing: Why to Wash Your Hands*, *Handwashing: How to Wash Your Hands*, *Calibrating a Thermometer: Ice Water Method*, *Calibrating a Thermometer: Boiling Water Method*, and *Active Cooling with a Chill Stick*.
- Each “flash” video is 2-4 minutes long and can be accessed online via YouTube. They are easy to view from a desktop, laptop, tablet or smart phone – perfect for onsite training! Individuals can earn 15 minutes (1/4 hour) of continuing education for [Professional Standards](#) when they watch all five videos in the series. A certificate of completion is available through the USDA FNS Office of Food Safety website.

### Time as Public Health Control

- When using “Time as a Public Health (Temperature) Control”:
  - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
  - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
  - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

Must be kept above 135 on hot line with mechanical heat	Must be kept under 41 degrees with mechanical refrigeration
Animal protein – eggs, meat, chicken, fish, shellfish, etc	Milk and cheese, including house made dressing made with milk
Tofu and soy products –texturized vegetable protein, hot edamame	Hard boiled eggs
Baked potatoes	Tofu, edamame, soy
Heat-treated plant food, such as cooked rice, beans, vegetables	Sliced melons, cut leafy greens, cut tomatoes
Anything with cheese	Untreated garlic-and-oil mixtures
	Sprouts

### Buy American

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers



and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the “domestic” standard as described above ( “non-domestic”) in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products. Thank you for attempting to find which products are non-compliant and search for replacements or complete the tracking form.

### **SBP and SFSP Outreach**

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.
- Breakfast is offered at the High School and the reduced-price as well as free eligible students receive a reimbursable breakfast meal for free.

### Breakfast Promotion

The breakfast participation in the Mukwonago High School is low compared to participation at lunch. Therefore, they are considering ideas for increasing participation, like a value pre-packed meal.

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

### Summer Meals

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Mukwonago School District, USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:
  - Promotion of the summer meals locator on the DPI Summer Meals website
  - Promotion of calling 211 to locate meals in the area
  - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
  - Promotion of the USDA Summer Food website  
<http://www.fns.usda.gov/summerfoodrocks>.

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD  
Summer Food Service Program Coordinator  
Phone: 608.266.7124  
e-mail: amy.kolano@dpi.wi.gov

**Findings and Corrective Action Needed:**

❑ **Finding #10:** The onsite monitoring forms have been updated to include the general areas of review and the newly required SBP program onsite monitoring form.

**Corrective Action Needed:** Please complete and submit the Breakfast Onsite monitoring form for the High School. Also, reference the newly added sections to the NSLP monitoring forms and use that for next year's monitoring process.

❑ **Finding #11:** All food service employees must have a signed Employee Reporting Agreement on file, to be updated annually.

**Corrective Action Needed:** Please submit a statement that all employees have signed the Standard Operating Procedure, pages 7-8 in the Food Safety Plan or this template <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/employee-reporting-agreement.pdf> to be included in their files or the Food Safety Plan at each site.

---

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called "Agenda 2017". His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage [dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017).

